

EXHIBIT C

Meisinger, Jeremy

From: Bean, Thomas <tbean@verrilldana.com>
Sent: Thursday, February 11, 2016 2:21 PM
To: Marx, Daniel; Van Lonkhuyzen, John
Cc: Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

Thanks, Dan.

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From: Marx, Daniel [<mailto:DMarx@foleyhoag.com>]
Sent: Thursday, February 11, 2016 1:42 PM
To: Bean, Thomas; Van Lonkhuyzen, John
Cc: Meisinger, Jeremy
Subject: Steward v. Southcoast Matter

Tom and John,

As we discussed yesterday, please find below some proposed language for addressing ESI and privilege issues in a possible discovery plan. My schedule for next week is still a bit uncertain, but I hope to have more clarity by the weekend. For timing purposes, we do not consider our discussion yesterday to have been our 26(f) conference, and on our next call, we can discuss what makes the most sense in terms of how to proceed in this case.

Regards,
Dan

Rule 26(f)(3)(C) Electronically Stored Information

The parties propose that all documents, except for Microsoft Excel, Project and Access files, shall be produced as black and white, Bates-stamped single-page TIFF images with accompanying document-level extracted text for electronically stored information ("ESI") or optical character recognition ("OCR") for scanned hard copy.

The parties further propose that all Microsoft Excel, Project, and Access files shall be produced in their native formats. If native files are included in a production, a Bates-stamped TIFF placeholder page rather than a full TIFF image should be provided; however, a TIFF image must be provided for every document.

The parties also agree that all productions shall be accompanied by an Opticon (.opt) single-page image load/cross reference file.

Rule 26(f)(3)(D) Privilege/Confidentiality Issues

The parties propose that discovery shall proceed in accordance with a separately filed Proposed Protective Order, to be jointly submitted to the Court, which shall include a prohibition on using discovery materials for any purpose other than in this federal litigation and also a claw-back provision for inadvertently produced privileged information.

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